

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**UAW Local 259 Social Security Department,  
Plaintiff,**

**V.**

**SMG Automotive Holdings, LLC and  
Zachary Schwebel,  
Defendants.**

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**Civil Action No. 20-cv-12141**

## REQUEST FOR ENTRY OF DEFAULT

To the Clerk of the Court:

Please enter a Default with respect to Defendants SMG Automotive Holdings, LLC and Zachary Schwebel pursuant to FRCP 55(a) for failure to answer or otherwise plead in the above-captioned matter.

Respectfully submitted,

**CLEARY, JOSEM & TRIGIANI, LLP**

BY: /s/ Jeremy E. Meyer

JOSEPH T. CLEARY, ESQUIRE  
JEREMY E. MEYER, ESQUIRE  
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325 Chestnut Street, Suite 200  
Philadelphia, PA 19106  
(215) 735-9099  
Attorneys for Plaintiffs

Dated: January 22, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Request for Entry of Default to be served upon the following by United States First Class Mail on the date indicated below:

SMG Automotive Holdings LLC  
d/b/a Brooklyn Chrysler Jeep Dodge Ram  
2286 Flatbush Avenue  
Brooklyn, NY 11234

Zachary Schwebel  
SMG Automotive Holdings LLC  
d/b/a Brooklyn Chrysler Jeep Dodge Ram  
2286 Flatbush Avenue  
Brooklyn, NY 11234

/s/ Jeremy E. Meyer  
JEREMY E. MEYER, ESQUIRE

Dated: January 22, 2021